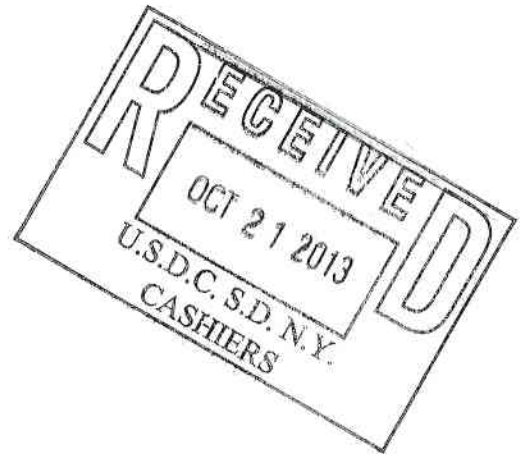


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**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**13 CIV 7398**

Case No.:

PAUL SPINELLI; SCOTT BOEHM; PAUL  
JASIENSKI; GEORGE NEWMAN  
LOWRANCE; DAVID STLUKA; DAVID  
DRAPKIN; and THOMAS E. WITTE,

*Plaintiffs,*

v.

NATIONAL FOOTBALL LEAGUE;  
NFL VENTURES, L.P.; NFL PRODUCTIONS,  
LLC; NFL ENTERPRISES, LLC; REPLAY  
PHOTOS, LLC; GETTY IMAGES (US), INC.; and  
ASSOCIATED PRESS,

*Defendants.*

**COMPLAINT AND DEMAND  
FOR A JURY TRIAL**

Plaintiffs Paul Spinelli, Scott Boehm, Paul Jasienski, George Newman Lowrance, David Stluka, Thomas Witte, and David Drapkin ("Plaintiffs"), by and through counsel, for their Complaint against Defendants National Football League; NFL Ventures, L.P.; NFL Productions, LLC; NFL Enterprises; Replay Photos, LLC; Getty Images (US), Inc.; and Associated Press (collectively "Defendants"), state as follows. Except as to allegations related specifically to the actions of the Plaintiffs, the allegations herein are based upon information and belief.

## **THE PARTIES**

1. Plaintiffs are professional photographers who make their living taking and licensing sports-related photographs, including but not limited to content related to National Football League (“NFL”) events.

2. Plaintiff Paul Spinelli (“Spinelli”) is a resident of the State of California. Plaintiff Spinelli is the sole owner of and does business through SpinPhotos, Inc. whose principal place of business is 1310 East Ocean Boulevard, #1006, Long Beach, California 90802. Plaintiff Spinelli formerly was a Director of the NFL’s now-dissolved Photographic Services division (“NFL Photos”).

3. Plaintiff Scott Boehm (“Boehm”) is a resident of the State of Illinois. Plaintiff Boehm is the sole owner of and does business through Boehm Creative, Inc. whose principal business address is P.O. Box 531, Lake Villa, Illinois 60046.

4. Plaintiff Paul Jasienski (“Jasienski”) is a resident of the State of Nevada. Plaintiff Jasienski resides at 179 Cantamar Street, Henderson, Nevada 89074.

5. Plaintiff George Newman Lowrance (“Lowrance”), who is known professionally as G. Newman Lowrance, is a resident of the State of Kansas. Plaintiff Lowrance resides at 12820 Goddard Avenue, Overland Park, Kansas 66213.

6. Plaintiff David Stluka (“Stluka”) is a resident of the State of Wisconsin. Plaintiff Stluka is the sole owner of and does business through David Stluka Photography, LLC whose principal business address is 117 South Main Street, Oregon, Wisconsin 53575.

7. Plaintiff David Drapkin (“Drapkin”) is a resident of the State of New Jersey. Plaintiff Drapkin resides at 2055 Princeton Avenue, Scotch Plains, New Jersey 07076.

8. Plaintiff Thomas E. Witte (“Witte”) a resident of the State of Ohio. Plaintiff Witte is the sole owner of and does business through GO Photography whose principal business address is 1006 Anderson Ferry Road, Cincinnati, Ohio 45238.

9. Defendant NFL is a tax-exempt association formed under 18 U.S.C. § 501(c)(6) with its business headquarters located at 280 Park Avenue, New York, New York.

10. Defendant NFL operates several business units, divisions, and/or corporate entities through which it carried out the misconduct described herein and each of which also participated in the misconduct described herein. The NFL’s business units or entities involved in the misconduct alleged herein include, but are not limited to, (i) the NFL itself and doing business as NFL Properties, both located at 280 Park Avenue, New York, New York; (ii) NFL Enterprises, also located at 280 Park Avenue, New York, New York; and (iii) NFL Network, located at 10950 Wash Boulevard, Culver City, California. Each of these businesses or business divisions operates under the exclusive control of the NFL.

11. Defendant NFL Ventures, L.P. is a limited partnership based in Delaware that advertises, promotes and markets the NFL, its brand and products, and its member teams. Defendant NFL Venture’s wholly-owned subsidiaries include Defendants NFL Productions LLC and NFL Enterprises LLC.

12. Defendant NFL Productions LLC, also known as Films LLC (“NFL Films”), produces NFL-related programming for the NFL and its member teams. NFL Films also provides services, including licensing of NFL-related content to customers operating in the entertainment and media industries.

13. Defendant NFL Enterprises LLC (“NFL Enterprises”) sells, advertises and promotes the NFL and its interests, including by operating the NFL’s primary website located at [www.nfl.com](http://www.nfl.com) (“NFL.com”).

14. Defendants NFL, NFL Ventures, and NFL Enterprises are referred to herein collectively as “the NFL” and/or “the NFL Defendants.”

15. Defendant Replay Photos, LLC (“Replay Photos”) is an online retailer that specializes in selling sports-related photographs. Replay Photos’ primary place of business is located at 112 South Duke Street, Suite 7, Durham, North Carolina. Replay Photos’ owns and operates the website located at [www.replayphotos.com](http://www.replayphotos.com).

16. Defendant Getty Images (US), Inc. (“Getty Images”), formed as a Delaware corporation, is the world’s largest aggregator and licensor of “stock” photography, including sports-related photo collections. Getty Images’ corporate headquarters is located at 605 5th Avenue South, Suite 400, Seattle, Washington. Getty Images also maintains offices and employees in this District at 75 Verick Street, New York, New York 10013. Plaintiffs formerly licensed their NFL photos at issue in this lawsuit through Getty Images.

17. Defendant Associated Press (“AP”) describes itself as a not-for-profit news “cooperative” that is owned by and made up of over 1,400 newspapers and media organizations. AP’s headquarters is located at 450 West 33rd St., New York, New York 10001. In addition to other services and products, AP also acts a licensing agent for stock photography collections. Plaintiffs currently license their NFL photos at issue in this lawsuit through AP.

### **NATURE OF THE ACTION**

18. This is an action for copyright infringement and related claims brought by Plaintiffs against Defendants for unauthorized uses of Plaintiffs' copyrighted photographs.

19. For many years, Plaintiffs obtained media credentials – either through their agents, Getty Images and AP, or directly from the NFL's member teams via the NFL's in-house photo services department which operated as a division of NFL Properties, Inc. – to photograph events for the NFL and its individual member teams.

20. Plaintiffs collectively have photographed hundreds, if not thousands, of NFL regular season games, NFL playoff games, NFL team practices, and other NFL functions. Over their careers, each Plaintiff has amassed a large collection or “library” of NFL-related photographs. Together, Plaintiffs have taken literally hundreds of thousands of NFL-related photographs.

21. Plaintiffs primarily photographed NFL games under so-called speculation agreements (or “on spec”), meaning that instead of being paid flat fees (also called “day rates”) for their work they retained ownership of the copyrights in the photos that they took during an event and then earned income by licensing their photos. This action involves only those photos that Plaintiffs created “on spec” and thus pertains only to those photos in which Plaintiffs retained and currently own copyrights; this action does not involve any photos that Plaintiffs occasionally may have created under day-rate or work-for-hire agreements. All allegations herein related to Plaintiffs' photographs refer only to those photographs that Plaintiffs created “on spec” and to which they own copyrights.

22. Although Plaintiffs' license the photos that they shot “on spec” through third-party licensing agents (formerly NFL Photos and then Getty Images and currently AP), they

never transferred their copyrights in these photos to their agents. Rather, as Plaintiffs' contributor agreements expressly provided, they retained sole and exclusive ownership of all copyrights in these photos.

23. This action concerns the NFL Defendants' rampant, willful, and continued misuse of photographs to which Plaintiffs own copyrights. This action also involves Getty Images' and AP's illegal and unethical misconduct which permitted, encouraged, and contributed to the NFL Defendants' infringements.

### **VENUE AND JURISDICTION**

24. Jurisdiction for Plaintiffs' claims lies with the United States District Court for the Southern District of New York pursuant to the Copyright Act of 1976, 17 U.S.C. §§ 101, *et seq.*, 28 U.S.C. § 1331 (conferring original jurisdiction "of all civil actions arising under the Constitution, laws, or treaties of the United States"), and 28 U.S.C. § 1338(a) (conferring original jurisdiction over claims arising under any act of Congress relating to copyrights).

25. This Court has jurisdiction over Plaintiffs' state and common law claims under 28 U.S.C. § 1967 because those claims are so related to the federal claims that they form part of the same case or controversy.

26. Venue is proper in this Court under 28 U.S.C. § 1391(b) since the alleged misconduct by Defendants giving rise to the claims asserted herein occurred in this District and 28 U.S.C. § 1400(b) since Defendants infringed Plaintiffs' copyrights in this District.

### **FACTUAL ALLEGATIONS**

27. Beginning in approximately 1965, the NFL formed and operated a division called NFL Photographic Services or "NFL Photos" which effectively operated as an "in-house" photo library and licensing agency. Through NFL Photos, the NFL actively solicited photography

from and hired freelance photographers in order to expand the NFL's brand, including through the licensing of photos to media outlets and commercial entities, as well as by publishing its own magazines, newsletters, books, public relations and promotional materials.

28. NFL Photos operated much like the more well-known NFL Films, except with an emphasis on "still" photography rather than film and video footage. One crucial difference, however, is that while the NFL generally owns the copyrights to the film and video footage now controlled by NFL Films, the NFL typically does not own copyrights in the still photos that it uses because the vast majority of photos are created by freelance photographers working "on spec."

29. Beginning in approximately 2003, the NFL transitioned away from an "in-house" photo library to licensing arrangements with established stock photography agencies, including Getty Images and WireImage. When Getty Images purchased WireImage's parent, MediaVast, in 2007, Getty Images obtained exclusive commercial licensing rights for NFL-related photos. Getty Images retained the exclusive NFL licensing rights until 2009.

30. At various times during this period, each Plaintiff entered into a "contributor agreement" with Getty Images pursuant to which Getty Images acted as Plaintiffs' agents and facilitated the licensing of their works, including but not limited to Plaintiffs' NFL collections.

31. In or about 2009, the NFL accepted new bids for the exclusive right to grant commercial licenses related to NFL-related photographic content. The NFL eventually selected AP's bid and the NFL and AP subsequently entered into an exclusive licensing agreement.

32. As a direct consequence of the NFL's decision to grant an exclusive license to AP, Plaintiffs lost the ability to sell higher-value commercial licenses, as opposed to editorial

licenses, through Getty Images. Thus, if Plaintiffs wished to continue offering commercial licenses for their NFL content, they were forced to transition their NFL collections to AP.

33. This option presented difficulties, however, because Plaintiffs also own the copyrights to and license other sports-related content, including photographs of Major League Baseball (“MLB”) and National Collegiate Athletic Association (“NCAA”) games and events, and Getty Images had exclusive licensing deals and/or significant licensing partnerships with these entities, including MLB.

34. In a blatant attempt to exploit this dilemma, Getty Images threatened to remove Plaintiffs’ other sports content from its distribution networks and/or terminate its relationship with Plaintiffs entirely if they did not agree to continue licensing their NFL content through Getty Images even after its commercial licensing deal with the NFL expired. Getty Images also made clear that it would not “welcome back” any contributors who moved their NFL content to AP should Getty Images ever regain the rights to license NFL content in the future.

35. Because certain Plaintiffs had significant non-NFL content at Getty Images, including significant MLB and NCAA photo collections, Getty Images’ position forced Plaintiffs to make an impossible choice between losing commercial licensing opportunities for their NFL content by not going to AP or giving up commercial licensing opportunities for their non-NFL content by leaving Getty Images.

36. Plaintiffs Jasienski, Stluka, Spinelli, Witte, and Drapkin risked Getty Images’ wrath and moved their NFL content to AP beginning in 2009. Plaintiffs Lowrance and Boehm chose not to risk the loss of other licensing opportunities and thus kept their NFL content at Getty Images. As result, Plaintiffs Lowrance and Boehm lost significant and valuable licensing opportunities for their literally tens of thousands of NFL-related photos by leaving those images



at Getty Images. Although Getty Images ultimately sub-licensed Lowrance's and Boehm's collections through AP, the number of sales of was significantly diminished and Plaintiffs were damaged because both agencies withheld their royalty rates.

37. Eventually, all Plaintiffs ended their relationships with Getty Images and entered into agreements to license their NFL content through AP. As a result, Plaintiffs have lost significant revenue due to the loss of licensing opportunities for their non-NFL content that resulted from the termination of their relationships with Getty Images.

38. Both Getty Images and AP represented and licensed Plaintiffs' photos at issue in this action on a "Rights Managed" basis meaning that the licenses sold by these agencies granted only limited usage rights to the customer/licensee. In addition, the license fees charged by the agencies were calculated based upon the scope of rights being granted, meaning that a license granting more usage rights required higher fees and a license granting more narrow usage rights required lower fees.

39. As the name suggests, Rights-Managed licensing also requires that the licensor (in this case, Getty Images and AP) track and manage the usage rights being granted to end users. This is crucial for several reasons, including that fees are directly linked to the usage rights being granted and also because the ability to subsequently grant high-value "exclusive" licenses depends on the licensor's ability to assure a prospective client that no other comparable rights have been granted to other customers, especially the prospective client's competitors.

40. Despite the fundamental obligations to license Plaintiffs' works according to these principles inherent in the Rights-Managed licensing model, including to track usage rights and also charge appropriate market value for each license, Plaintiffs recently discovered that both Getty Images and AP granted the NFL nearly unfettered access to Plaintiffs' photo collections

and, either expressly or by inaction, allowed the NFL to make free or “complimentary” use of Plaintiffs’ copyrighted photos. In doing so, Getty Images and AP not only failed to charge the NFL appropriate market value for licenses to use thousands of Plaintiffs’ photos, they both also failed to monitor, track, or responsibly manage the NFL’s use of Plaintiffs’ photos. The failure of Getty Images and AP to track and monitor the NFL’s use of Plaintiffs’ photos severely undermines the future value of their works.

41. As a result of this misconduct by AP and Getty Images, the NFL was able to copy, display, publish, and even sublicense, including to Defendant Replay Photos, literally thousands of Plaintiffs’ copyrighted works without ever paying any compensation to Plaintiffs and without ever reporting the uses it has made of Plaintiffs’ works.

42. The NFL has earned substantial revenue through publishing (including in NFL Magazine and other NFL-controlled publications) and also licensing or selling (including through the NFL Photo Store and Replay Photos) copies of photographs owned exclusively by Plaintiffs for which the NFL never obtained a valid license or paid appropriate licensing fees.

43. When the NFL entered into its licensing agreement with Getty Images, it was not granted free or “complimentary” use of photographic content. Nor was the NFL granted a “Royalty Free” license to use photos owned by Plaintiffs. Indeed, because Getty Images did not own the content in Plaintiffs’ image collections and also because Plaintiffs’ photos were submitted to Getty Images as Rights Managed images, Getty Images lacked authority to grant unfettered usage rights or complimentary and indefinite use licenses to the NFL without obtaining separate and express permission from Plaintiffs for each such “complimentary” license or use.

44. Plaintiffs' contributor agreements with Getty Images precluded Getty Images from granting usage rights at no cost and Getty Images' own standard terms and conditions for usage licenses pertaining to Rights Managed photos prohibited such use.

45. When the NFL entered into its exclusive licensing agreement with AP in 2009, that agreement also did not include a complimentary license to the NFL and certainly did not grant the NFL free and unfettered use of Plaintiffs' content.

46. Like their prior contributor agreements with Getty Images, Plaintiffs' "Contributor Photographer Agreements" or "Contributor NFL Photographer Agreements" with AP also did not permit AP to grant free and unfettered licenses to any customers, including the NFL.

47. Significantly, Plaintiffs' contributor agreements with AP also did not grant AP authority to pursue infringements or negotiate settlements on behalf of Plaintiffs. On the contrary, each Plaintiff's contributor agreement with AP expressly provided that the photographer retained all copyrights in his work, which would include the exclusive right to pursue claims for infringements.

48. Despite these restrictions and limits on AP's authority, Plaintiffs discovered that AP was permitting the NFL to use Plaintiffs' photos without paying for any usage rights and without reporting usages to Plaintiffs on their royalty statements. Given AP's total lack of reporting of NFL usages, it is clear that AP did not make any effort to track or monitor the NFL's use of Plaintiffs' photos. To this date, AP has never identified which of the photos owned by Plaintiffs that it provided to the NFL or whether the NFL currently possesses high-resolution copies of the photos acquired from AP.

49. When Plaintiffs contacted the NFL to demand that it cease and desist using their copyrighted works without permission and without paying the requisite licensing fees, the NFL falsely represented that its 2009 contract with AP included an express license that allowed complimentary use of any NFL-related photos licensed by AP, including even the photos owned by Plaintiffs.

50. Because such a license would violate the express terms and fundamental purpose of Plaintiffs' agreements with AP, Plaintiffs contacted AP to inquire about the NFL's seemingly preposterous claim. As expected, AP denied the NFL's claim and assured Plaintiffs that not only did the 2009 agreement between AP and NFL not include such a license, but the AP was currently renegotiating its agreement with the NFL to address the widespread misuse of photos by the NFL.

51. Thereafter, AP agreed to allow Plaintiffs input into this negotiation process, and AP and Plaintiffs also began negotiating amendments to Plaintiffs' contributor agreements to allow the NFL very narrow, specific, and limited usage rights pertaining to Plaintiffs' works in exchange for specific consideration.

52. During these contract negotiations, AP inexplicably decided to grant the NFL a purported "license" that was complimentary and "Royalty Free" and "retroactive" to 2009. The AP made the unilateral decision to grant this purported "license" without ever advising Plaintiffs of its intention to do so, without their consent, and despite their express objections.

53. The clear purpose of the retroactive "license" granted to the NFL by AP was to release or extinguish the copyright infringement claims that Plaintiffs recently had brought to the NFL's attention and to attempt to insulate the NFL Defendants from liability for the copyright infringements identified herein and that are the subject of this action.

54. AP granted this retroactive “license” to the NFL under threats and coercive pressure by the NFL, including the threat of moving its exclusive license back to Getty Images, which also had submitted a bid to reacquire the NFL’s business.

55. Again, Plaintiffs’ contributor agreements with AP do not authorize AP to pursue infringements or settle claims on their behalf, and Plaintiffs never authorized AP to grant any release to any infringers and certainly not to do so without notifying Plaintiffs in advance and without Plaintiffs receiving any compensation.

56. Plaintiffs’ contributor agreements with the AP also include minimum royalty payments, typically set forth in Section 5.1 of each agreement, requiring AP to pay a minimum royalty payment per each photo sale. In other words, Plaintiffs’ contracts with AP expressly prohibit AP from granting “free” or “complimentary” usage rights to any licensee, including the NFL Defendants.

57. The 2012 agreement between the NFL and AP thus violates Plaintiffs’ agreements with AP and the purported retroactive/royalty-free/complimentary “license” granted therein is invalid.

58. The use of photographic works is one of the key ways that the NFL markets and promotes itself. The NFL, however, does not own the copyrights to the vast majority of the photographic content that it uses, including the works created by Plaintiffs. As such, the NFL must obtain licenses prior to using Plaintiffs’ works.

59. Despite being well aware that it does not own the copyrights to Plaintiffs’ works and its own 38-years of experience operating NFL Photos as a stock photo agency that managed the licensing of photos owned by its contributing photographers, the NFL systemically used thousands of Plaintiffs’ photos for promotional, marketing, and commercial purposes without a

license or permission from Plaintiffs or their agents – that is until 2012 when the NFL leveraged its illegal monopoly to force AP to grant a retroactive/royalty-free/complimentary “license” to use Plaintiffs’ works for the clear purpose of hoping to avoid claims for copyright infringement.

60. The NFL exploited its singular control and illegal monopoly of the commercial licensing rights to NFL content to force Getty Images and now AP to grant the NFL unfettered access to Plaintiffs’ image libraries and to rob Plaintiffs of their rightful compensation for the uses the NFL has made, and continues to make, of their copyrighted works.

61. The NFL has been able to convince Plaintiffs’ licensing agents to allow this rampant and blatant exploitation of Plaintiffs’ works only because of its illegal monopoly over the commercial licensing rights to NFL content.

62. At the time the NFL and AP negotiated this purported “license,” both entities were well aware that Plaintiffs did not condone the free or complimentary use of their works by the NFL.

63. Despite Plaintiffs’ issuing repeated cease and desist demands, the NFL Defendants continue to use literally thousands of Plaintiffs’ photographic works to promote the NFL’s brand, sell NFL-related products, and enhance the NFL’s image in order to generate revenue both as an independent entity and on behalf of its thirty-two member clubs. The NFL Defendants’ unlicensed use of Plaintiffs’ copyrighted photos is broad and ongoing.

64. The NFL has used and continues to use hundreds of Plaintiffs’ photos on the NFL’s main website, NFL.com.

65. The NFL also has illegally exported copies of Plaintiffs’ works in order to copy and publish them on its international websites, including [www.nfljapan.com](http://www.nfljapan.com) and [www.nflmexico.com](http://www.nflmexico.com) and [www.nfl.com/international](http://www.nfl.com/international).

66. The NFL also has copied and published Plaintiffs' works in printed publications, including NFL Magazine, the NFL's Super Bowl Programs, the NFL's Reports and Newsletters, and even in NFL regular season and playoff game programs. The NFL has used and continues to use Plaintiffs' photos on the NFL Network without ever paying for such use and without the uses being reported to Plaintiffs.

67. In a particularly egregious example, the NFL used a photograph of Aaron Rodgers to which Plaintiff Stluka owns sole and exclusive copyrights to promote Super Bowl XLV in Dallas by draping the image over a multi-story portion of the façades of the Omni Hotel and Cowboys Stadium without ever paying Plaintiff Stluka for these uses of his photo. (*See* Exhibit at Lines 25 & 26)

68. Attached hereto as Exhibits 1 to 7 are true and correct copies of recent screen captures from NFL.com showing the widespread use of Plaintiffs' works.

69. Although a very few number of the images included in Exhibit 1 through 7 were shot by Plaintiffs under "day rate" agreements for the NFL years ago, the vast majority of the astounding number of images currently being used by the NFL on its website were created by Plaintiffs "on spec" and they own sole and exclusive copyrights in these images.

70. Even those images for which Plaintiffs own all copyrights, the NFL has never paid any fees or compensation to Plaintiffs for these uses and none of these uses has ever been reported to Plaintiffs on any royalty report or otherwise.

71. Attached hereto as Exhibits 8 to 13 are spreadsheets identifying hundreds of unauthorized and infringing uses of the photos to which Plaintiffs own full copyrights. As these spreadsheets demonstrate, the NFL Defendants have used and are continuing to use photos to which Plaintiffs own all copyrights on NFL.com, NFLJapan.com, and the NFL Network.

72. Plaintiffs' copyright infringement claims relate to all uses identified in Exhibits 8 to 13, and the information contained in these exhibits is fully incorporated herein.

73. The NFL used and is using Plaintiffs' photos in various ways, including in conjunction with articles, as part of photo "essays," and also to create stand-alone photo "galleries." Attached hereto as Exhibit 14 is a true and correct copy of the main photo gallery page on NFL.com. Plaintiffs' photos are included in many dozens of the galleries. Attached hereto as Exhibit 15 are true and correct copies of screen captures from various photo galleries showing the use of Plaintiffs' photos.

74. Consistent with its practice of monetizing every possible interaction with its fan base, the NFL forces any visitor who views such photo "galleries" and "essays" to view advertisements and promotional materials after a pre-set number of "clicks" or photos viewed. Nevertheless, despite the plain commercial character and value of these uses of Plaintiffs' photos, the NFL has never paid any licensing fees to Plaintiffs, and certainly not the appropriate commercial licensing rates required for such uses.

75. As the screen captures attached as Exhibit 15 demonstrate, the photo "galleries" on NFL.com permit visitors access to large resolution copies of Plaintiffs' photos without appropriate copyright management information or protection against illegal copying. The NFL also encourages visitors to "tweet" on Twitter.com or "share" on Facebook.com copies of Plaintiffs' works, despite the fact that the NFL does not own the copyrights to these photos.

76. Certain photo galleries also include links that allow and encourage visitors to buy copies of the photos, including many of Plaintiffs' photos. The NFL sells copies of photographs directly to consumers through [www.nflshop.com](http://www.nflshop.com) and also the "NFL Photo Store" located at [www.nflphotostore.nfl.com](http://www.nflphotostore.nfl.com). The photos that the NFL makes available for sale through NFL



Photo Store it also makes available for sale through Defendant Replay Photos. Attached hereto as Exhibit 16 are true and correct copies of screen captures showing numerous photos owned by Plaintiffs Spinelli, Boehm, Lowrance, Stluka, and Witte that currently are for sale at the NFL Photo Store. In each case, the NFL incorrectly claims that AP owns copyright in the photos being offered for sale when in fact Plaintiffs own the sole and exclusive copyrights in each photo. Once again, although the NFL and Replay Photos are selling copies of Plaintiffs photos, typically for hundreds of dollars, the NFL has not paid any licensing fees, royalties, or other compensation to Plaintiffs for these uses.

77. That the NFL and Replay Photos have sold and continue to offer for sale copies of Plaintiffs' photos is particularly egregious given that AP, on behalf of the NFL, requested that Plaintiffs agree to amendments to their contributor agreements to allow such sales and Plaintiffs expressly rejected AP's request and did not agree to the proposed amendment to their contributor agreements. Nevertheless, AP apparently has authorized or allowed the NFL to use Plaintiffs' photos in this manner. These infringements are blatant and willful.

78. The NFL also is using Plaintiffs' photographs during broadcasts on its newly-launched NFL Network. Attached hereto as Exhibits 17 are true and correct copies of photos of the credits from recent broadcasts on the NFL Network demonstrating that the NFL Network used copies of Plaintiffs' photos during broadcasts. In each case, the NFL Network falsely claimed that its use of Plaintiffs' photos was "courtesy of" Plaintiffs when, in actuality, Plaintiffs never agreed to allow the NFL Network to use their photos and were unaware of any such use by the NFL until recently.

79. Because Getty Images and AP failed to monitor or track or report which photos were acquired by or provided to the NFL, Plaintiffs cannot yet determine the full scope of the

NFL Defendants' use of their copyrighted works. The infringements identified in Exhibits 8 through 13 merely highlight that the NFL Defendants' unlicensed uses of Plaintiffs' photos is widespread and ongoing.

80. Because information regarding the full scope of the NFL's use of Plaintiffs' photos remains in the Defendants sole possession, it is clear that the infringements identified herein and in Exhibits 8 through 13 are not exhaustive and it is clear that the NFL certainly used many additional photos owned by Plaintiffs without a license and without paying necessary license fees.

81. The NFL has realized substantial revenues from displaying and licensing photographic content, including but not limited to fees paid by commercial entities selling copies of Plaintiffs' photos and also websites that use NFL-related photos in advertisements and to promote products, such as fantasy football leagues.

**COUNT I: COPYRIGHT INFRINGEMENT**  
**AGAINST ALL DEFENDANTS**

82. Plaintiffs repeat and re-allege each of the above allegations as if set forth fully herein.

83. The information included in the attached Exhibits is incorporated fully herein.

84. The foregoing acts by Defendants infringed Plaintiffs' copyrights.

85. Plaintiffs created and own sole and exclusive copyrights in and to the creative works identified in Exhibits 8 to 13.

86. Plaintiffs also own copyrights to additional photos used and being used by the NFL Defendants without permission or a valid license. Because the information regarding the

full scope of Defendants' use of Plaintiffs' photos remains in Defendants' sole possession, Plaintiffs cannot currently ascertain all uses of the works to which they own copyright.

87. Plaintiffs' copyrights in and to photographs that are the subject of this action, including all photos identified in Exhibits 8 to 13, have been registered with the United States Copyright Office.

88. The NFL Defendants and Replay Photos infringed Plaintiffs' copyrights by copying, publishing, displaying, exporting, and otherwise using and exploiting photographic works to which Plaintiffs own all copyrights without a license.

89. Any purported retroactive or complimentary or royalty-free "license" that the NFL may claim to have obtained from AP is invalid, including because AP did not have authority to grant such a "retroactive" license.

90. At the time the NFL negotiated such a retroactive or complimentary or royalty-free "license" with AP, the NFL was aware that Plaintiffs did not authorize or consent to the NFL's complimentary use of their photos and that Plaintiffs objected to AP's allowing such complimentary use of their photos.

91. Even after Plaintiffs expressly informed the NFL that Plaintiffs considered any implied license from AP or Getty Images or any retroactive "license" to be invalid and repeatedly demanded that the NFL cease and desist using their photos without paying for an appropriate license, the NFL Defendants continued using Plaintiffs' photos and continue to use their photos to this day.

92. The NFL Defendants also infringed Plaintiffs' copyrights by illegally exporting their photos, including by copying and publishing them on NFLJapan.com and NFLMexico.com.

93. The NFL Defendants also infringed Plaintiffs' copyrights by providing copies of Plaintiffs' photos to third parties, including Defendant Replay Photos, and such uses of Plaintiffs' photos by Defendant Replay Photos also are unlicensed and infringing.

94. Plaintiffs' "Contributing Photographer Agreements" with AP specifically provided that Plaintiffs' retained all copyrights in their photos and that the license granted to AP was non-exclusive.

95. As such, AP had no authority to pursue copyright infringements or settle infringement claims on behalf of Plaintiffs.

96. Despite this restriction on AP's licensing rights, AP intentionally granted the NFL a purported "license" that was retroactive and intended to release or extinguish Plaintiffs' copyright claims against the NFL.

97. AP granted this purported "license" without consulting with Plaintiffs and over their clear objections.

98. By doing so, AP exceeded its limited rights to grant prospective licenses to Plaintiffs' works and thereby infringed their copyrights, including Plaintiffs' exclusive right to pursue infringement claims related to the unauthorized uses of their photos.

99. Defendants' infringements and unauthorized use of Plaintiffs' copyrighted works was willful, intentional, and/or reckless.

100. Plaintiffs seek all damages recoverable under the Copyright Act, including statutory or actual damages, including Defendants' profits attributable to the infringements.

101. Plaintiffs also seek all attorneys' fees and any other costs incurred in litigating this matter.

**COUNT II: VICARIOUS COPYRIGHT INFRINGEMENT**  
**AGAINST GETTY IMAGES & ASSOCIATED PRESS**

102. Plaintiffs repeat and re-allege each of the above allegations as if set forth fully herein.

103. The foregoing acts by Getty Images and AP constitute vicarious copyright infringement.

104. Getty Images and AP were aware or should have been aware of the NFL's extensive copying and publishing of Plaintiffs' photos.

105. Despite their responsibility to act as Plaintiffs' agents, Getty Images and AP ignored the NFL's misconduct and turned a "blind eye" to the NFL's infringements.

106. Getty Images and AP directly contributed to the NFL's infringements, including by permitting unfettered access to Plaintiffs' works and making the intentional decision not to monitor or track the NFL's uses and not to require that the NFL report back all uses of Plaintiffs' photos.

107. Despite their ability to do so, Getty Images and AP also failed to stop the NFL's infringements even after Plaintiffs brought the infringements to their attention.

108. Getty Images' and AP's misconduct was willful, intentional, and/or reckless.

109. Plaintiffs seek all damages recoverable under the Copyright Act, including statutory or actual damages, including Getty Images' and AP's profits attributable to the infringements.

110. Plaintiffs also seek all attorneys' fees and any other costs incurred in litigating this matter.

**COUNT III: CONTRIBUTORY COPYRIGHT INFRINGEMENT**  
**AGAINST GETTY IMAGES & ASSOCIATED PRESS**

111. Plaintiffs repeat and re-allege each of the above allegations as if set forth fully herein.

112. The foregoing acts by Getty Images and AP constitute contributory copyright infringement.

113. Getty Images and AP were aware or should have been aware of the NFL's copying and publishing of Plaintiffs' photos.

114. Despite their responsibility to act as Plaintiffs' agent, Getty Images and AP permitted, allowed, caused, contributed to, and/or encouraged the NFL to continuing using Plaintiffs' photos without paying the requisite license fees or reporting such uses to Plaintiffs.

115. Getty Images and AP directly contributed to the NFL's infringements, including by permitting unfettered access to Plaintiffs' works and intentionally not monitoring or tracking the NFL's activities.

116. Despite their ability to do so, Getty Images and AP also failed to stop the NFL's infringements even after Plaintiffs brought the infringements to their attention.

117. Getty Images' and AP's misconduct was willful, intentional, and/or reckless.

118. Plaintiffs seek all damages recoverable under the Copyright Act, including statutory or actual damages, including Getty Images' and AP's profits attributable to the infringements.

119. Plaintiffs also seek all attorneys' fees and any other costs incurred in litigating this matter.

**COUNT IV: BREACH OF CONTRACT**  
**AGAINST GETTY IMAGES & ASSOCIATED PRESS**

120. Plaintiffs repeat and re-allege each of the above allegations as if set forth fully herein.

121. Getty Images and AP breached their contracts with Plaintiffs through the foregoing acts.

122. Plaintiffs' contributor agreements with AP specifically provided that Plaintiffs' retained all copyrights in their photos, including the exclusive right to pursue claims for infringements.

123. As such, AP had no authority to grant the NFL a retroactive "license" intended to release Plaintiffs' copyright claims against the NFL.

124. Plaintiffs' contributor agreements with Getty Images and AP also required each agency to charge license fees to customers and then pay a percentage of that fee to Plaintiffs as a royalty.

125. By permitting the NFL unfettered access to and complimentary use of Plaintiffs' works, Getty Images and AP breached their obligations under their agreements with Plaintiffs.

126. Plaintiffs' agreements with Getty Images and AP also required each agency to report all client usages on a periodic royalty statement.

127. Getty Images and AP breached this obligation by failing to track or monitor the NFL's use of Plaintiffs' photos and failing to report to Plaintiffs any purported "licenses" granted to NFL.

128. Plaintiffs seek all damages recoverable against Getty Images and AP under New York and/or Washington law.

**COUNT V: BREACH OF FIDUCIARY DUTY**  
**AGAINST GETTY IMAGES & ASSOCIATED PRESS**

129. Plaintiffs repeat and re-allege each of the above allegations as if set forth fully herein.

130. Getty Images and AP each had a responsibility to act as Plaintiffs' agents and yet each breached its fiduciary obligations to Plaintiffs through the acts, omissions, and misconduct detailed herein.

131. Getty Images and AP represented Plaintiffs as their licensing agents and each defendant held itself out to third parties as Plaintiffs' agent.

132. Getty Images and AP thus were obliged to deal with Plaintiffs fairly and in good faith and not to act in a manner that was against their interests.

133. Getty Images and AP breached their fiduciary obligations by failing to track and monitor the NFL's use of their photos and failing to charge the NFL appropriate licensing fees for using Plaintiffs' photos.

134. AP also breached its fiduciary obligations by attempting to release or extinguish Plaintiffs' copyright claims against the NFL, particularly by doing so without any compensation for Plaintiffs.

135. Even if AP had authority to negotiate a settlement of Plaintiffs' claims against the NFL, AP's own business dealings with the NFL created an intractable conflict of interest and thus AP should have refrained from exercising such authority or should have informed Plaintiffs of the conflict and included them in its negotiations with the NFL.

136. Getty Images and AP also breached their fiduciary obligations by refusing Plaintiffs' repeated demand for information regarding which photos the NFL had downloaded from each agency's website and other systems.



137. Getty Images and AP refused to provide this information to Plaintiffs in order to conceal its own misconduct and protect the NFL Defendants.

138. The conduct of Getty Images and AP reveals that each defendant acted in its own selfish interest or the interest of the NFL, which was a customer, rather than fulfilling its duties as Plaintiffs' agent.

139. Plaintiffs seek all damages recoverable against Getty Images AP under New York and/or Washington and/or common law.

**WHEREFORE**, Plaintiffs respectfully pray for judgment on their behalf and for the following relief:

1. A preliminary and permanent injunction against the NFL Defendants and Replay Photos from copying, displaying, distributing, and/or selling Plaintiffs' works or any publications or other materials that include Plaintiffs' works, and requiring the NFL Defendants and Reply Photos to deliver to the Court for destruction or other appropriate disposition all relevant materials, including digital files of Plaintiffs' photographs and all copies of any infringing materials that included Plaintiffs' works that are in the control or possession or custody of the NFL Defendants or Replay Photos;

2. From all Defendants, all allowable damages under the Copyright Act, including, but not limited to, statutory or actual damages, including damages incurred as a result of Plaintiffs' loss of licensing revenue and Defendants' profits attributable to the infringements of Plaintiffs' rights;

3. All allowable damages caused by and/or resulting from Getty Images' and AP's breaches of contract and violation of their fiduciary obligations, including actual damages and punitive damages if available;

4. Plaintiffs' full costs, including litigation expenses, expert witness fees, interest, and any other amounts authorized under law, and attorneys' fees incurred in pursuing and litigating this matter;

5. Any other relief authorized by law, including punitive and/or exemplary damages; and

6. For such other and further relief as the Court deems just and proper.

**JURY TRIAL DEMANDED**

Dated: October \_\_, 2013  
New York, New York.

Respectfully submitted,

NELSON & McCULLOCH LLP

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*Attorneys for Plaintiffs*

**EXHIBIT 1**

**To Plaintiffs' Complaint in  
*Spinelli, et al. v. NFL, et al.***


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### Seattle Seahawks vs. Denver Bronco: September 23, 1979

The Broncos came from 24 points behind to win 37-34. (AP Photo/Pa

Photos | Tuesday, October 16 , 2012



### Tampa Bay Buccaneers vs. St. Louis November 8, 1987

The Cardinals came from 25 points behind to win 31-28. (AP Photo/P

Photos | Tuesday, October 16 , 2012



### Champ Bailey, Clarence Moore

 Safety Champ Bailey #24 of the Denver Broncos intercepts an end z for wide receiver Clarence Moore #94 of the Baltimore Ravens at INV High on October 9, 2006 in Denver, Colorado. The Broncos defeated (AP Photo/Paul **Spinelli** )

Photos | Friday, June 22 , 2012



### Bobby Mitchell

 35. Bobby Mitchell - June 6, 1935 Former Washington Redskins player honored during pregame player introductions during the NFL week 9 the San Francisco 49ers on Sunday, November 6, 2011 in Landover, Photo/Paul **Spinelli** )

Photos | Thursday, May 17 , 2012

### Phil Simms

New York Giants quarterback Phil Simms (11) throws a pass during t between the Pittsburgh Steelers and the New York Giants on August Rutherford, New Jersey. The Giants won the game 16-9. (AP Photo/I

Photos | Friday, June 15 , 2012


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## APSUBJECTNAME

A young fan with green hair waves a foam finger as he cheers for his Philadelphia Eagles NFL week 6 football game against the Atlanta Falcons on October 17, 2010 in Philadelphia, Pennsylvania. The Eagles won the game 27-10. (AP Photo/Paul **Spinelli**)

Photos | Thursday, May 17, 2012



## Carson Palmer

Quarterback Carson Palmer #9 of the AFC Cincinnati Bengals unloads a pass during the 2007 NFL Pro Bowl at Aloha Stadium on February 10, 2008. The AFC defeated the NFC 31-28. (AP Photo/Paul **Spinelli**)

Photos | Saturday, April 21, 2012



## 2. America!

A large American flag is unfurled during pregame ceremonies before the Oakland Raiders game against the Detroit Lions on Sunday, September 30, 2012. (AP Photo/Paul **Spinelli**)

Photos | Sunday, September 30, 2012



A San Francisco 49ers fan waves a Niners Christmas hat as he yells during the NFL football game against the Detroit Lions on December 27, 2009 in San Francisco, California. The 49ers won the game 20-6. (AP Photo/Paul **Spinelli**)

Photos | Tuesday, December 20, 2011



## Ricky Williams

Running back Ricky Williams #34 of the Miami Dolphins talks to the media and accepts the award as Most Valuable Player in the 2003 NFL Pro Bowl at Aloha Stadium in Honolulu, Hawaii on February 2, 2003. The AFC defeated the NFC 31-28. (AP Photo/Paul **Spinelli**)

Photos | Tuesday, February 7, 2012



An Oakland Raiders fan who looks like Santa Claus wears a Christmas hat during the NFL football game against the Indianapolis Colts on Sunday, December 16, 2011 in Oakland, California. The Colts won the game 31-26. (AP Photo/Paul **Spinelli**)

Photos | Tuesday, December 20, 2011



## Hispanic Heritage Month

Antonio Garay, DT, San Diego Chargers (AP Photo/Paul **Spinelli**)

Photos | Monday, September 17, 2012



## Ogemdi Nwagbue



Ogemdi Nwagbuo (AP Photo/Paul **Spinelli** )

Photos | Thursday, May 31 , 2012



A San Diego Chargers fan with a painted blue face and a fu manchu haircut looks on during the NFL week 10 football game against the Oakland Raiders on Thursday, November 10, 2011 in San Diego, California. The Raiders (AP Photo/Paul **Spinelli** )

Photos | Thursday, May 17 , 2012



## Cedric Killings

DL Cedric Killings - Ditto for Killings. (AP Photo/Paul **Spinelli** )

Photos | Wednesday, February 22 , 2012



An Oakland Raiders fan with silver and black spiked hair and painted face hangs out during a preseason game against the St. Louis Rams on Thursday, August 9, 2011 at the McAfee Coliseum in Oakland, California. The Raiders defeated the Rams 24-17. (AP Photo/Paul **Spinelli** )

Photos | Thursday, May 17 , 2012



A Miami Dolphins fan with a painted face and a hair piece makes a funny face during an NFL football game against the Tampa Bay Buccaneers, November 15, 2011 in Miami Gardens, Florida. The Dolphins won the game 25-23. (AP Photo/Paul **Spinelli** )

Photos | Thursday, May 17 , 2012



Life (reinstated after 1 year): Terry Taylor, Detroit, substance abuse, 5 years in prison. (AP Photo/Paul **Spinelli** /Associated Press)

Photos | Thursday, May 3 , 2012



## Sam Huff

30. Sam Huff - October 4, 1934 Sam Huff waves to the crowd during the Pro Football Hall of Fame induction ceremony on July 29, 2000 in Canton, Ohio. (AP Photo/Paul **Spinelli** )

Photos | Thursday, May 17 , 2012



A Christmas wreath decorated with lights and ornaments hangs on the sideline wall during the San Diego Chargers game against the San Francisco 49ers on Thursday, December 15, 2011 in San Diego, California. The Chargers won the game 34-7. (AP Photo/Paul **Spinelli** )

Photos | Tuesday, December 20 , 2011



Green Bay Packers fans with green painted hair, team clothes, eye black and face paint look on during the NFL game against the San Diego Chargers on Sunday, December 10, 2011 in San Diego, California. The Packers won the game 24-17. (AP Photo/Paul **Spinelli** )



cheesehead hat pose for a photo during the NFC Wild Card Game at Cardinals, January 10, 2010 in Glendale, Arizona. The Cardinals won overtime. (AP Photo/Paul **Spinelli** )

Photos | Thursday, May 17 , 2012



**Bruce Smith**

Bruce Smith: Buffalo Bills, 1985 (AP Photo/Paul **Spinelli** )

Photos | Tuesday, April 24 , 2012



An Oakland Raiders fan with a mohawk haircut and painted head tail football game against the New York Giants, Sunday, October 11, 200 New Jersey. The Giants won the game 44-7. (AP Photo/Paul **Spinelli** )

Photos | Thursday, May 17 , 2012



**Willie Roaf**

Offensive tackle Willie Roaf of the Kansas City Chiefs pass blocks ag Texans at Arrowhead Stadium on September 26, 2004. (AP Photo/Paul **Spinelli** )

Photos | Saturday, July 7 , 2012



**Curtis Martin,Donnie Edwards**

Martin was held to 66 yards on 18 carries by the San Diego Chargers Card Game at Qualcomm Stadium on Jan. 8, 2005. The Jets defeate 17 in overtime. (AP Photo/Paul **Spinelli** )

Photos | Sunday, July 8 , 2012



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### Willie Roaf

 Offensive tackle Willie Roaf of the Kansas City Chiefs pass blocks ag  
Texans at Arrowhead Stadium on September 26, 2004. (AP Photo/P

Photos | Saturday, July 7 , 2012



### Bruce Smith

 Bruce Smith: Buffalo Bills, 1985 (AP Photo/Paul **Spinelli** )

Photos | Tuesday, April 24 , 2012



### Curtis Martin, Donnie Edwards

 Martin was held to 66 yards on 18 carries by the San Diego Chargers  
Card Game at Qualcomm Stadium on Jan. 8, 2005. The Jets defeat  
17 in overtime. (AP Photo/Paul **Spinelli** )

Photos | Sunday, July 8 , 2012


 A young fan of the Dallas Cowboys shows off his mohawk haircut an  
painted on his head during the 2008 Dallas Cowboys Training Camp  
in Oxnard, California on July 26, 2008. (AP Photo/Paul **Spinelli** )

Photos | Thursday, May 17 , 2012



### Brendon Ayanbadejo

 Brendon Ayanbadejo (AP Photo/Paul **Spinelli** )

Photos | Thursday, May 31 , 2012


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## James Laurinaitis

James Laurinaitis (AP Photo/Paul **Spinelli** )

Photos | Thursday, May 31 , 2012



Members of the Buffalo Bills Jills cheerleader squad does a dance for week 2 football game against the Kansas City Chiefs on Sunday, Sep Buffalo, N.Y. The Bills won the game 35-17. (AP Photo/Paul **Spinelli** )

Photos | Wednesday, September 19 , 2012



Jets do a pregame flyover during the Tennessee Titans NFL week 7 t the Houston Texans on Sunday, October 23, 2011 in Nashville, Tenn won the game 41-7. (AP Photo/Paul **Spinelli** )

Photos | Wednesday, November 2 , 2011



A San Diego Chargers fan with spiked blue hair and a painted face p before the NFL football game against the Kansas City Chiefs, Novem Diego, California. The Chargers won the game 43-14. (AP Photo/Pau

Photos | Thursday, May 17 , 2012



## Clay Matthews

Green Bay Packers linebacker Clay Matthews (52) wears a cheese h to the press at Super Bowl XLV media day prior to NFL Super Bowl ) Pittsburgh Steelers. Media day was held on Tuesday, February 1, 20 Texas. (AP Photo/Paul **Spinelli** )

Photos | Monday, June 4 , 2012



A San Diego Chargers fan holds a sign wishing for a playoff game as during the NFL week 15 football game against the San Francisco 49e December 16, 2010 in San Diego, California. The Chargers won the g Photo/Paul **Spinelli** )

Photos | Tuesday, December 20 , 2011



## Bill Sullivan, Irving Fryar

New England Patriots owner Bill Sullivan (far right) poses for a photo Patriots Irving Fryar (28) and his mother during the 1984 NFL Draft he in New York, New York. (AP Photo/Paul **Spinelli** )

Photos | Thursday, April 12 , 2012



One Season: Adam "Pacman" Jones, Tennessee, personal conduct,

Photo/Paul **Spinelli** )

Photos | Wednesday, May 2 , 2012

**James Lofton**

Green Bay Packers wide receiver James Lofton (80) moves off the line of scrimmage during the 1983 NFL season. (AP Photo/Paul **Spinelli** )

Photos | Thursday, July 5 , 2012



A Green Bay Packers fan wears a cheese head hat and cheers for the Packers during the 2011 NFL season. (AP Photo/Paul **Spinelli** )

Photos | Monday, June 4 , 2012

**Willie Roaf, Stephen Cooper**

Offensive tackle Willie Roaf of the Kansas City Chiefs against linebacker Stephen Cooper of the San Diego Chargers on Jan. 2, 2005, at Qualcomm Stadium in San Diego. (AP Photo/Paul **Spinelli** )

Photos | Saturday, July 7 , 2012



Green Bay Packers fans hold a sign and wave a pom pom while wearing hats during the NFC Wild Card Game against the Arizona Cardinals, in Glendale, Arizona. The Cardinals won the game 51-45 in overtime. (AP Photo/Paul **Spinelli** )

Photos | Monday, June 4 , 2012

**9. Week 7, 2006.**

Drew Bledsoe's abysmal first-half performance in Week 7 prodded Bill Belichick to bench him and start Tom Brady. Brady threw three touchdowns to Tony Romo in the second half. Romo threw three picks in the loss, but led the Cowboys to a 9-7 finish and a playoff berth. (AP Photo/Paul **Spinelli** )

Photos | Monday, September 3 , 2012

**Kaluka Maiava**Kaluka Maiava (AP Photo/Paul **Spinelli** )

Photos | Thursday, May 31 , 2012

**Adrian Peterson, Kris Jenkins, Chris Johnson**

Running back Adrian Peterson of the Minnesota Vikings scores a third touchdown to tie the score at 24-24 in the 2009 NFL Pro Bowl at Aloha Stadium in Honolulu. The NFC defeated the AFC 30-21. (AP Photo/Paul **Spinelli** )

Photos | Wednesday, June 20 , 2012

**Adrian Peterson**



NFC running back Adrian Peterson of the Minnesota Vikings talks to the media during a break in the action at the 2009 NFL Pro Bowl at Aloha Stadium on February 1, 2010 in Honolulu, Hawaii. The NFC defeated the AFC 30-21. (AP Photo/Paul...

Photos | Wednesday, June 20 , 2012



### Phil Simms

New York Giants quarterback Phil Simms (11) runs with the ball during a game between the Philadelphia Eagles and the New York Giants on September 16, 1980 in East Rutherford, New Jersey. The Giants won the game 21-0. (AP Photo/...

Photos | Friday, June 15 , 2012



### Phil Simms

New York Giants Phil Simms (11) and the offense huddle during a game between the New York Giants and the Dallas Cowboys on July 25, 1984. (AP Photo/Paul Spinelli )

Photos | Friday, June 15 , 2012



The Oakland Raiders cheerleaders flip their hair during a pregame dance at the NFL preseason week 1 football game against the Dallas Cowboys on August 13, 2012 in Oakland, California. The Cowboys won the game 3-0. (AP Photo/Paul Spinelli )

Photos | Wednesday, August 15 , 2012



### Phil Simms

New York Giants quarterback Phil Simms (11) throws a pass during a game between the New York Jets and the New York Jets in East Rutherford, New Jersey on August 28, 1982. The Giants won the game 21-10. (AP Photo/Paul Spinelli )

Photos | Friday, June 15 , 2012

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A Cincinnati Bengals fan with red hair reflects the field in his sunglasses week 6 football game against the Indianapolis Colts on Sunday, Octo Cincinnati, Ohio. The Bengals won the game 27-17. (AP Photo/Paul )

Photos | Thursday, May 17 , 2012



Green Bay Packers fans wearing cheese head hats and antlers wave touchdown during Super Bowl XLV against the Pittsburgh Steelers or 2011, in Arlington, Texas. The Packers won the game 31-25. (AP Ph

Photos | Monday, June 4 , 2012



A Washington Redskins fan dressed in an Uncle Sam costume salute week 11 football game against the Dallas Cowboys on Sunday, Nove Landover, Maryland. The Cowboys won the game in overtime 27-24. **Spinelli** )

Photos | Friday, May 25 , 2012



Two Green Bay Packers fans wearing cheesehead hats pose for a pt week 10 football game against the Minnesota Vikings on Monday, No Green Bay, Wisconsin. The Packers won the game 45-7. (AP Photo/

Photos | Monday, June 4 , 2012

### Fergie

Part owner of the Miami Dolphins Stacy Ann Ferguson, also known a National Anthem before the NFL week 1 football game against the Ne on Monday, September 12, 2011 in Miami Gardens, Florida. The Patr 38-24. (AP Photo/Paul **Spinelli** )


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Photos | Tuesday, June 12, 2012



Two Green Bay Packers fans wear cheese head hats and cheer for the NFL week 10 football game against the Minnesota Vikings on Monday, November 12, 2011 in Green Bay, Wisconsin. The Packers won the game 45-7. (AP Photo/Paul **Spinelli**)

Photos | Monday, June 4, 2012



Philadelphia Eagles head coach Buddy Ryan, right, speaks with NFL Steve Sabol, left, before a 38 to 28 San Francisco 49ers win over the Eagles in Philadelphia, Pennsylvania. (AP Photo/Paul **Spinelli**)

Photos | Wednesday, September 19, 2012



## James Ihedigbo

James Ihedigbo (AP Photo/Paul **Spinelli**)

Photos | Thursday, May 31, 2012



## James Lofton

Wide Receivers Coach James Lofton of the Oakland Raiders looks on during the game against the Houston Texans at Oakland-Alameda County Coliseum on Sunday, July 8, 2012 in Oakland, California. The Raiders defeated the Texans 27-16. (AP Photo/Paul **Spinelli**)

Photos | Thursday, July 5, 2012



## Jerry Jones, Steve Perry, Bob Lilly

46. Bob Lilly - July 26, 1939 Former Dallas Cowboys player Bob Lilly (AP Photo/Paul **Spinelli**)

Photos | Thursday, May 17, 2012



A vendor sells cheese head hats prior to Super Bowl XLV pitting the New England Patriots against the Pittsburgh Steelers on Sunday, Feb. 6, 2011, in Arlington, Texas. The Patriots won the game 31-25. (AP Photo/Paul **Spinelli**)

Photos | Monday, June 4, 2012



The New Orleans Saints cheerleaders do a dance routine during the NFL football game against the Detroit Lions on Saturday, January 7, 2012 in New Orleans, Louisiana. The Saints won the game 45-28. (AP Photo/Paul **Spinelli**)

Photos | Wednesday, January 11, 2012



Fans of the Pittsburgh Steelers suit up in team merchandise with a St



and colored hair against the Denver Broncos in the AFC Championsh 2006 at INVESCO Field at Mile High in Denver, Colorado. The Steel Broncos 34-17. (AP Photo/Paul **Spinelli** )

Photos | Thursday, May 17 , 2012



## Ray Lewis

Linebacker Ray Lewis #52 of the American Football Conference AFC Ravens drops back in pass coverage at practice the day before the 2 Aloha Stadium on February 7, 2009 in Honolulu, Hawaii. (AP Photo/P

Photos | Tuesday, May 15 , 2012



## Phil Simms

New York Giants quarterback Phil Simms (11) runs with the ball durin game between the Philadelphia Eagles and the New York Giants on : East Rutherford, New Jersey. The Giants won the game 21-0. (AP Ph

Photos | Friday, June 15 , 2012



## Tom Nalen, Clinton Portis, Al Wilson

Denver Broncos Tom Nalen, Clinton Portis, and Al Wilson at the 200 where the NFC rallied from 25 points behind to win the game by a rec 55 to 52 over the AFC in Honolulu, Hawaii on February 7, 2004. (AP )

Photos | Thursday, August 23 , 2012



## Champ Bailey

Denver Broncos cornerback Champ Bailey (24) gets set for the snap Pro Bowl football game between the AFC All-Stars and the NFC All-S January 29, 2012 in Honolulu, Hawaii. The AFC won the game 59-41 **Spinelli** )

Photos | Friday, June 22 , 2012



## Willie Roaf, Stephen Cooper

Offensive tackle Willie Roaf of the Kansas City Chiefs against linebac of the San Diego Chargers on Jan. 2, 2005, at Qualcomm Stadium ir Photo/Paul **Spinelli** )

Photos | Saturday, July 7 , 2012



Two Green Bay Packers fans wear cheese head hats and cheer for tl NFL week 10 football game against the Minnesota Vikings on Monda 2011 in Green Bay, Wisconsin. The Packers won the game 45-7. (AP **Spinelli** )

Photos | Monday, June 4 , 2012



Green Bay Packers fans hold a sign and wave a pom pom while wear hats during the NFC Wild Card Game against the Arizona Cardinals, , Glendale, Arizona. The Cardinals won the game 51-45 in overtime. (/ **Spinelli** )

Photos | Monday, June 4 , 2012



Christmas stockings and decorations on display prior to the San Dieg



football game against the Cincinnati Bengals, December 20, 2009 in Cincinnati, Ohio. (AP Photo/Paul **Spinelli**)

Photos | Tuesday, December 20 , 2011



**Phil Simms**

New York Giants quarterback Phil Simms (11) throws a deep pass during a game against the Denver Broncos on November 23, 1986 in East Rutherford, New Jersey. The Giants won the game 19-16. (AP Photo/Paul **Spinelli**)

Photos | Friday, June 15 , 2012



**Mike Williams**

Buccaneers WR Mike Williams recorded 924 yards and scored 10 touchdowns during the 2010 season. (AP Photo/Paul **Spinelli**)

Photos | Monday, January 3 , 2011



**Jonathan Crompton**

San Diego Chargers rookie quarterback Jonathan Crompton (8) throws a pass during a rookie minicamp on May 7, 2010 in San Diego, California. (AP Photo/Paul **Spinelli**)

Photos | Sunday, May 9 , 2010



A Cincinnati Bengals Ben-Gal cheerleader smiles during the NFL week 14 game against the Miami Dolphins on Sunday, October 31, 2010 in Cincinnati, Ohio. The Bengals won the game 22-14. (AP Photo/Paul **Spinelli**)

Photos | Monday, November 1 , 2010



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### Ryan Fitzpatrick

Bills quarterback Ryan Fitzpatrick is available in 99 percent of league quarterback in Week 5, he's a great sleeper against the Jaguars. No more fantasy points to opposing quarterbacks after four weeks. (AP F

Photos | Tuesday, October 5 , 2010



### 2009 NFL Cheerleaders: Best of 2009

NFL cheerleaders pose for a group photo after the American Football Stars practice session during the 2010 NFL Pro Bowl practice, Janua Lauderdale, Florida. (AP Photo/Paul **Spinelli** )

Photos | Monday, March 15 , 2010



### 2009 NFL Cheerleaders: Week 16

San Diego Chargers cheerleaders wearing Christmas outfits do a dar pom poms during the NFL football game against the Cincinnati Bengals in San Diego. The Chargers won the game 27-24. (AP Photo/P

Photos | Sunday, December 27 , 2009



### Thomas Jones

Free-agent Thomas Jones Signed with the Kansas City Chiefs. (AP P

Photos | Thursday, March 4 , 2010

### Jared Allen

63. Jared Allen (AP Photo/Paul **Spinelli** )

Photos | Wednesday, April 21 , 2010


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### 2009 NFL Cheerleaders: Best of 2009

A Denver Broncos cheerleader leaps as she performs a dance routine in honor of Breast Cancer Awareness Month during the NFL game against the Dallas Cowboys, Sunday, October 4, 2009 in Denver, Colorado. The Broncos won the game 17-10. (AP Photo/Paul **Spinelli**)

Photos | Monday, March 15, 2010



### 2009 NFL Cheerleaders: Best of 2009

A San Diego Chargers cheerleader smiles and waves her pom-poms during the AFC Divisional Playoff game against the New York Jets, January 17, 2010 in San Diego, California. The Jets won the game 17-14. (AP Photo/Paul **Spinelli**)

Photos | Monday, March 15, 2010



### Drew Brees

21. Drew Brees (AP Photo/Paul **Spinelli**)

Photos | Wednesday, April 21, 2010



### 2009 NFL Cheerleaders: Best of 2009

New Orleans Saints cheerleaders wave pom-poms and pose for a photo on a platform after Super Bowl XLIV against the Indianapolis Colts, February 7, 2010 in Miami Gardens, Florida. The Saints won the game 31-17. (AP Photo/Paul **Spinelli**)

Photos | Monday, March 15, 2010



### Chester Taylor

Free-agent Chester Taylor signed with the Chicago Bears. (AP Photo/Paul **Spinelli**)

Photos | Thursday, March 4, 2010



### 2009 NFL Cheerleaders: Week 10

A Miami Dolphins cheerleader performs during the NFL football game between the Miami Dolphins and the Tampa Bay Buccaneers, November 15, 2009 in Miami, Florida. The Dolphins won the game 23-17. (AP Photo/Paul **Spinelli**)

Photos | Monday, November 16, 2009



### Julius Peppers

71. Julius Peppers (AP Photo/Paul **Spinelli**)

Photos | Wednesday, April 21, 2010

### 2009 NFL Cheerleaders : Conference



## Championships

An Indianapolis Colts cheerleader does a hair flip during a dance routine at a championship football game against the New York Jets, January 24, 2010. The Colts won the game 30-17. (AP Photo/Paul **Spinelli**)

Photos | Monday, January 25, 2010



## Aaron Hernandez

New England Patriots TE Aaron Hernandez is available in 77 percent of fantasy lineups, becoming a popular target for QB Tom Brady. He had a six-catch per game average worth a fantasy roster spot. (AP Photo/Paul **Spinelli**)

Photos | Tuesday, September 28, 2010



## Ryan Clark

Free-agent Ryan Clark is still on the market. (AP Photo/Paul **Spinelli**)

Photos | Thursday, March 4, 2010



## Dwight Freeney

58. Dwight Freeney (AP Photo/Paul **Spinelli**)

Photos | Wednesday, April 21, 2010



## 2009 NFL Cheerleaders: Best of 2009

San Francisco 49ers cheerleaders line up during pregame introduction at a football game against the Detroit Lions, December 27, 2009 in San Francisco. The 49ers won the game 20-6. (AP Photo/Paul **Spinelli**)

Photos | Monday, March 15, 2010



## Ed Reed

39. Ed Reed (AP Photo/Paul **Spinelli**)

Photos | Wednesday, April 21, 2010



## 2009 NFL Cheerleaders: Week 13

A Buffalo Bills cheerleader waves her pom poms as she dances during a game against the New York Jets, December 3, 2009 in Buffalo. The Bills won the game 19-13. (AP Photo/Paul **Spinelli**)

Photos | Sunday, December 6, 2009



## 2009 NFL Cheerleaders: Week 16

A San Diego Chargers cheerleader wearing a Christmas-themed outfit during a game against the Cincinnati Bengals, December 20, 2009 in San Diego. The Chargers won the game 27-24. (AP Photo/Paul **Spinelli**)

Photos | Sunday, December 27, 2009

## Jay Cutler



Fantasy miss: Jay Cutler Cutler was 16 for 25 passing for 156 yards.  
**Spinelli** )

Photos | Monday, November 22 , 2010



Fantasy hits: Peyton Hillis Hillis had 26 carries for 131 yards and three touchdowns.  
Photo/Paul **Spinelli** )

Photos | Monday, November 29 , 2010



## Chris Henry

Wide receiver Chris Henry #15 of the Cincinnati Bengals goes out for a game against the Washington Redskins at Paul Brown Stadium on December 13, 2009. The Bengals defeated the Redskins 20-13. (AP Photo/Paul **Spinelli** )

Photos | Wednesday, December 16 , 2009



## LaDainian Tomlinson

22. LaDainian Tomlinson (AP Photo/Paul **Spinelli** )

Photos | Wednesday, April 21 , 2010



## Demetris Veal

Demetris Veal played five NFL seasons with three teams (Atlanta Falcons, Tennessee Titans). He finished his career with 66 tackles, 2 forced fumbles. (AP Photo/Paul **Spinelli** )

Photos | Monday, March 28 , 2011

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### 2009 NFL Cheerleaders: Week 16

A San Diego Chargers cheerleader wearing a Christmas outfit cheers her pom poms during the NFL football game against the Cincinnati Bengals in San Diego. The Chargers won the game 27-24. (AP Photo/Paul Spinelli)

Photos | Sunday, December 27, 2009



### Ryan Mathews

San Diego Chargers rookie running back Ryan Mathews (24) catches during a Chargers rookie minicamp on May 7, 2010 in San Diego, California. (AP Photo/Paul Spinelli)

Photos | Sunday, May 9, 2010



### Lawrence Taylor

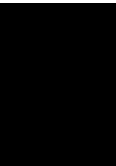
10. Lawrence Taylor (AP Photo/Paul Spinelli)

Photos | Saturday, April 24, 2010



A Cincinnati Bengals cheerleader waves her pom poms and routine during the NFL week 8 football game against the Miami Dolphins in Cincinnati, Ohio. The Dolphins won the game 22-17. (AP Photo/Paul Spinelli)

Photos | Monday, November 1, 2010



### Ed Reed

39. Ed Reed (AP Photo/Paul Spinelli)

Photos | Wednesday, April 21, 2010

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A Cincinnati Bengals Ben-Gal cheerleader does a dance routine with costume as part of the Halloween halftime show during the NFL week against the Miami Dolphins on Sunday, October 31, 2010 in Cincinnati won the game 22-14. (AP Photo/Paul **Spinelli** )

Photos | Monday, November 1 , 2010



## Jonathan Stewart

Carolina Panthers RB Jonathan Stewart is available in 44 percent of I (AP Photo/Paul **Spinelli** )

Photos | Monday, December 6 , 2010



## Marshawn Lynch

Seattle Seahawks RB Marshawn Lynch is available in 76 percent of I chance to be the featured back with his new team. Get him now befo (Photo/Paul **Spinelli** )

Photos | Tuesday, October 12 , 2010



## Deion Branch

Since leaving the Patriots in 2005, WR Deion Branch (5-9) hasn't quit Seahawks. He's failed to play a full season in Seattle, and his best se when he finished with 53 catches for 725 yards and four touchdowns (Photo/Paul **Spinelli** )

Photos | Monday, April 5 , 2010



## Jamaal Fudge

DB Jamaal Fudge played four seasons (2006-09) with two different te Jaguars, Atlanta Falcons). (AP Photo/Paul **Spinelli** )

Photos | Monday, March 28 , 2011



## LaDainian Tomlinson

22. LaDainian Tomlinson (AP Photo/Paul **Spinelli** )

Photos | Wednesday, April 21 , 2010



## 2009 NFL Cheerleaders: Week 16

A San Diego Chargers cheerleader wearing a Christmas looks on du game against the Cincinnati Bengals, December 20, 2009 in San Dieg won the game 27-24. (AP Photo/Paul **Spinelli** )

Photos | Sunday, December 27 , 2009



## Jay Cutler



Fantasy miss: Jay Cutler Cutler was 16 for 25 passing for 156 yards.  
**Spinelli** )

Photos | Monday, November 22 , 2010



## Chris Henry

Wide receiver Chris Henry #15 of the Cincinnati Bengals goes out for game against the Washington Redskins at Paul Brown Stadium on D Cincinnati, Ohio. The Bengals defeated the Redskins 20-13. (AP Pho

Photos | Wednesday, December 16 , 2009



## 2009 NFL Cheerleaders: Week 13

A Buffalo Bills cheerleader waves her pom poms as she does a danc NFL football game against the New York Jets, December 3, 2009 in Jets won the game 19-13. (AP Photo/Paul **Spinelli** )

Photos | Sunday, December 6 , 2009



## Frank Gore

Frank Gore, RB, San Francisco 49ers (AP Photo/Paul **Spinelli** )

Photos | Tuesday, May 11 , 2010



## LaDainian Tomlinson

Free-agent LaDainian Tomlinson signed with the New York Jets. (AP )

Photos | Sunday, March 7 , 2010



Fantasy hits: Peyton Hillis Hillis had 26 carries for 131 yards and thre Photo/Paul **Spinelli** )

Photos | Monday, November 29 , 2010



## Detroit Lions v San Diego Chargers

SAN DIEGO - DECEMBER 16: Rookie wide receiver Calvin Johnson Lions straight arms a Chargers defender during the game against the at Qualcomm Stadium on December 16, 2007 in San Diego, Californi **Spinelli** /Getty Images)

Photos | Monday, December 17 , 2007



## Tony Romo

Added pressure will be on Tony Romo this season, as he faces a piv star WR Terrell Owens. (AP Photo/Paul **Spinelli** )

Photos | Wednesday, August 19 , 2009

## NFL Commissioner Roger Goodell Pre





## Conference

PHOENIX, AZ - FEBRUARY 1: NFL Commissioner Roger Goodell addresses the media and answers questions at a Super Bowl XLII news conference at the Convention Center on February 1, 2008 in Phoenix, Arizona. (Photo by Paul Spinelli /Getty Images)

Photos | Friday, February 1, 2008



## Dallas Cowboys v Washington Redskins

LANDOVER, MD - DECEMBER 30: Cornerback Fred Smoot #27 of the Dallas Cowboys leaps and goes horizontal while breaking up a deep pass by receiver Miles Austin #19 of the Washington Redskins at FedEx Field on December 30, 2007 in Landover, Maryland. (Photo by Paul Spinelli /Getty Images)

Photos | Monday, December 31, 2007



## NFL Commissioner Roger Goodell Pre Conference

PHOENIX, AZ - FEBRUARY 1: The Vince Lombardi Trophy was on display during NFL Commissioner Roger Goodell's Super Bowl XLII news conference at the Convention Center on February 1, 2008 in Phoenix, Arizona. (Photo by Paul Spinelli /Getty Images)

Photos | Friday, February 1, 2008



## New York Giants v Dallas Cowboys

IRVING, TX - JANUARY 13: Linebacker Greg Ellis #98 of the Dallas Cowboys fans to make some noise against the New York Giants at the NFC Divisional game at Texas Stadium on January 13, 2008 in Irving, Texas. The Giants defeated the Cowboys 21-17. (Photo by Paul Spinelli /Getty Images)

Photos | Monday, January 14, 2008



## Wild Card Game: Tennessee Titans v San Diego Chargers

SAN DIEGO, CA - JANUARY 6: Chargers flags and U.S. flags fly over Qualcomm Stadium during the AFC Wild Card playoff game against the Tennessee Titans on January 6, 2008 in San Diego, California. (Photo by Paul Spinelli /Getty Images)

Photos | Monday, January 7, 2008

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### Wild Card Game: Tennessee Titans v Chargers

SAN DIEGO, CA - JANUARY 6: Chargers flags and U.S. flags fly over lot at the San Diego Chargers AFC Wild Card playoff game against the Tennessee Titans at Qualcomm Stadium on January 6, 2008 in San Diego, California. (Photo by **Spinelli** /Getty Images)

Photos | Monday, January 7, 2008



### NFL Commissioner Roger Goodell Pre Conference

PHOENIX, AZ - FEBRUARY 1: The Vince Lombardi Trophy was on display during Commissioner Roger Goodell's Super Bowl XLII news conference at the Phoenix Convention Center on February 1, 2008 in Phoenix, Arizona. (Photo by **Spinelli** /Getty Images)

Photos | Friday, February 1, 2008



### Dallas Cowboys v Washington Redskins

LANDOVER, MD - DECEMBER 30: Wide receiver Antwaan Randle El of the Washington Redskins catches a pass during the game against the Dallas Cowboys at FedEx Field on December 30, 2007 in Landover, Maryland. (Photo by **Spinelli** /Getty Images)

Photos | Monday, December 31, 2007



### 5 Receive Top Performers Week 15

SAN DIEGO - DECEMBER 16: Rookie wide receiver Calvin Johnson of the Detroit Lions recorded 5 receptions for 102 yards against the San Diego Chargers at Qualcomm Stadium on December 16, 2007 in San Diego, California. (Photo by **Spinelli** /Getty Images)

Photos | Monday, December 17, 2007

### Matt Hasselbeck

Coming off an injury-riddled 2008 season, Matt Hasselbeck is back, and hope winning football games is too. (AP Photo/Paul **Spinelli**)


 NFL.COM REWARDS  
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Photos | Wednesday, August 19 , 2009



## Dallas Cowboys v Washington Redskins

LANDOVER, MD - DECEMBER 30: Quarterback Todd Collins #15 of Redskins unloads a pass during the game against the Dallas Cowboy December 30, 2007 in Landover, Maryland. (Photo by Paul **Spinelli**)

Photos | Monday, December 31 , 2007



## Wild Card Game: Tennessee Titans v Chargers

SAN DIEGO, CA - JANUARY 6: Cars line up to pass through security parking lot for the San Diego Chargers AFC Wild Card playoff game : Tennessee Titans at Qualcomm Stadium on January 6, 2008 in San Diego. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, January 7 , 2008



## Tampa Bay Buccaneers v San Francisco 49ers

SAN FRANCISCO - DECEMBER 23: Backup quarterback Luke McCutchen #12 of Tampa Bay Buccaneers unloads a deep pass during the game against the San Francisco 49ers on December 23, 2007 at Monster Park in San Francisco, California. The Buccaneers defeated the Bucs 21-19. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 24 , 2007



## 2009 NFL Cheerleaders: Preseason

The Oakland Raiders cheerleaders do a dance routine during an NFL game against the New Orleans Saints, Saturday, August 29, 2009 in New Orleans. The Saints won the game 45-7. (AP Photo/Paul **Spinelli**)

Photos | Sunday, August 30 , 2009



## Detroit Lions v San Diego Chargers

SAN DIEGO - DECEMBER 16: Tight end Brandon Manumaleuna #86 of the San Diego Chargers catches a 1 yard pass for a second quarter touchdown during the game against the Detroit Lions at Qualcomm Stadium on December 16, 2007 in San Diego. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 17 , 2007



## AFC-NFC Pro Bowl

HONOLULU, HI - FEBRUARY 10: Running back Adrian Peterson #28 of the Minnesota Vikings runs the ball against the AFC during the 2008 NFL Pro Bowl game on February 10, 2008 in Honolulu, Hawaii. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, February 11 , 2008



## New York Giants v Dallas Cowboys

IRVING, TX - JANUARY 13: Quarterback Tony Romo #9 of the Dallas Cowboys throws a pass against the New York Giants at the NFC Divisional Playoff Game on January 13, 2008 in Irving, Texas. The Giants defeated the Cowboys 14-10. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, January 14 , 2008



## Detroit Lions v San Diego Chargers

SAN DIEGO - DECEMBER 16: Wide receiver Brandon Middleton #10 catches a 9 yard pass for a touchdown in the second quarter during the game between the Detroit Lions and San Diego Chargers at Qualcomm Stadium on December 16, 2007 in San Diego, California. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 17, 2007



## James Harrison

James Harrison, Outside Linebacker, Pittsburgh Steelers. (Photo by Paul **Spinelli** /Getty Images)

Photos | Tuesday, December 18, 2007



## AFC-NFC Pro Bowl

HONOLULU, HI - FEBRUARY 10: Head Coach Mike McCarthy of the Green Bay Packers watches pregame warmups against the AFC during the 2008 NFL Pro Bowl at Aloha Stadium on February 10, 2008 in Honolulu, Hawaii. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, February 11, 2008



## Tampa Bay Buccaneers v San Francisco 49ers

SAN FRANCISCO - DECEMBER 23: Running back Frank Gore #21 of the San Francisco 49ers gets some air as he runs the ball during the game against the Tampa Bay Buccaneers on December 23, 2007 at Monster Park in San Francisco. The 49ers defeated the Bucs 21-19. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 24, 2007



## AFC-NFC Pro Bowl

HONOLULU, HI - FEBRUARY 10: Fullback Lorenzo Neal #41 of the San Diego Chargers scores a first quarter touchdown on a running play to give the Chargers a 7-0 lead over the NFC during the 2008 NFL Pro Bowl at Aloha Stadium on February 10, 2008 in Honolulu, Hawaii. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, February 11, 2008



## NFL Commissioner Roger Goodell Pre Super Bowl Conference

PHOENIX, AZ - FEBRUARY 1: The Walter Payton Man of the Year Award is presented to NFL Commissioner Roger Goodell during the Super Bowl XLII news conference at the Phoenix Convention Center on February 1, 2008 in Phoenix, Arizona. (Photo by Paul **Spinelli** /Getty Images)

Photos | Friday, February 1, 2008



## AFC-NFC Pro Bowl

HONOLULU, HI - FEBRUARY 10: Wide receiver Larry Fitzgerald #11 of the Arizona Cardinals scores a touchdown in the first quarter to tie the game at 7-7 during the 2008 NFL Pro Bowl at Aloha Stadium on February 10, 2008 in Honolulu, Hawaii. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, February 11, 2008



## Detroit Lions v San Diego Chargers

SAN DIEGO - DECEMBER 16: Linebacker Shaun Phillips #95 of the San Diego Chargers returns an 18 yard interception for a touchdown in the second quarter during the game between the Detroit Lions and San Diego Chargers at Qualcomm Stadium on December 16, 2007 in San Diego, California. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 17, 2007



### Detroit Lions v San Diego Chargers

SAN DIEGO - DECEMBER 16: Wide receiver Brandon Middleton #10 catches a pass for a first down in the second quarter during the game between the San Diego Chargers and the Detroit Lions at Qualcomm Stadium on December 16, 2007 in San Diego. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 17, 2007



### Tampa Bay Buccaneers v San Francisco 49ers

SAN FRANCISCO - DECEMBER 23: Head Coach Mike Nolan of the Tampa Bay Buccaneers gestures toward his players during the game against the San Francisco 49ers at Monster Park in San Francisco, California. The Buccaneers won 21-19. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 24, 2007



### Tampa Bay Buccaneers v San Francisco 49ers

SAN FRANCISCO - DECEMBER 23: Head Coach Jon Gruden of the Tampa Bay Buccaneers gives some players a look during the game against the San Francisco 49ers at Monster Park in San Francisco, California. The Buccaneers won 21-19. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 24, 2007



### AFC-NFC Pro Bowl

HONOLULU, HI - FEBRUARY 10: Kelly Rowland performs the National Anthem during the 2008 NFL Pro Bowl at Aloha Stadium in Honolulu, Hawaii. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, February 11, 2008



### Kris Dielman

Kris Dielman, Guard, San Diego Chargers. (Photo by Paul **Spinelli** /

Photos | Tuesday, December 18, 2007



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### Detroit Lions v San Diego Chargers

SAN DIEGO - DECEMBER 16: Running back Darren Sproles #43 of the San Diego Chargers scores a 1 yard touchdown on a third quarter running play against the Detroit Lions at Qualcomm Stadium on December 16, 2007 in San Diego, California. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 17, 2007



### pats\_dolphins\_36

ORCHARD PARK, NY - NOVEMBER 18: Linebacker Adalius Thomas of the New England Patriots in action during the game against the Buffalo Bills on November 18, 2007 at Ralph Wilson Stadium in Orchard Park, New York. The Patriots defeated the Buffalo Bills 27-10. (Photo by Paul **Spinelli** /Getty Images)

Photos | Tuesday, December 25, 2007



### New York Giants v Dallas Cowboys

IRVING, TX - JANUARY 13: Running back Marion Barber #24 of the Dallas Cowboys runs with the ball against the New York Giants at the NFC Divisional Playoff Game on January 13, 2008 in Irving, Texas. The Giants defeated the Dallas Cowboys 14-10. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, January 14, 2008



### AFC-NFC Pro Bowl

HONOLULU, HI - FEBRUARY 10: Cornerback Antonio Cromartie #31 of the New England Patriots returns the first of two of his interceptions against the NFC during the AFC-NFC Pro Bowl at Aloha Stadium on February 10, 2008 in Honolulu, Hawaii. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, February 11, 2008



### Dallas Cowboys v Washington Redskins

LANDOVER, MD - DECEMBER 30: Cornerback Shawn Springs #24 of the Dallas Cowboys intercepts a pass intended for wide receiver Terry Glenn #8 of the Washington Redskins during the game on December 30, 2007 in Landover, Maryland. (Photo by Paul **Spinelli** /Getty Images)


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Photos | Monday, December 31 , 2007



## New York Giants v Dallas Cowboys

IRVING, TX - JANUARY 13: A Dallas Cowboys cheerleader waves her arms in a dance routine at the NFC Divisional Playoff Game against the New York Giants on January 13, 2008 in Irving, Texas. The Giants defeated the Cowboys 14-10. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, January 14 , 2008



## Dallas Cowboys v Washington Redskins

LANDOVER, MD - DECEMBER 30: Quarterback Tony Romo #9 of the Dallas Cowboys drops back to pass during the game against the Washington Redskins on December 30, 2007 in Landover, Maryland. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 31 , 2007



## pats\_dolphins\_24

ORCHARD PARK, NY - NOVEMBER 18: Defensive end Ty Warren #91 of the New England Patriots during a break in the action at the game against the Miami Dolphins on November 18, 2007 at Ralph Wilson Stadium in Orchard Park, New York. The Patriots defeated the Dolphins 24-10. (Photo by Paul **Spinelli** /Getty Images)

Photos | Tuesday, December 25 , 2007



## AFC-NFC Pro Bowl

HONOLULU, HI - FEBRUARY 10: Tight end Chris Cooley #21 of the Washington Redskins scores a touchdown with 28 seconds left in the first half to win the 2008 NFL Pro Bowl at Aloha Stadium on February 10, 2008 in Honolulu, Hawaii. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, February 11 , 2008



## Tampa Bay Buccaneers v San Francisco 49ers

SAN FRANCISCO - DECEMBER 23: Running back Frank Gore #21 of the San Francisco 49ers runs through a hole in the line during the game against the Tampa Bay Buccaneers on December 23, 2007 at Monster Park in San Francisco, California. The 49ers won 21-19. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 24 , 2007



## Detroit Lions v San Diego Chargers

SAN DIEGO - DECEMBER 16: Quarterback Jon Kitna #8 of the Detroit Lions passes the ball during the game against the San Diego Chargers at Qualcomm Stadium on December 16, 2007 in San Diego, California. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 17 , 2007



## AFC-NFC Pro Bowl

HONOLULU, HI - FEBRUARY 10: Kick returner Josh Cribbs #16 of the Cleveland Browns avoids an arm tackle by Tony Richardson #49 of the NFC's Miami Dolphins during a kick return at the 2008 NFL Pro Bowl at Aloha Stadium on February 10, 2008 in Honolulu, Hawaii. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, February 11 , 2008

## AFC-NFC Pro Bowl



HONOLULU, HI - FEBRUARY 10: Running Adrian Peterson #28 of the Vikings runs the ball while being tackled by safety John Lynch #47 of the Broncos during the 2008 NFL Pro Bowl at Aloha Stadium on February 10, 2008 in Honolulu, Hawaii. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, February 11, 2008



### Detroit Lions v San Diego Chargers

SAN DIEGO - DECEMBER 16: Quarterback Philip Rivers #17 of the Chargers unloads a pass during the game against the Detroit Lions at Qualcomm Stadium on December 16, 2007 in San Diego, California. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 17, 2007



### New York Giants v Dallas Cowboys

IRVING, TX - JANUARY 13: Head Coach Wade Phillips of the Dallas Cowboys stands on the sidelines at the New York Giants NFC Divisional Playoff Game on January 13, 2008 in Irving, Texas. The Giants defeated the Cowboys. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, January 14, 2008



### AFC-NFC Pro Bowl

HONOLULU, HI - FEBRUARY 10: Tight end Tony Gonzalez #88 of the Chiefs gains extra yardage after a first quarter catch against the NFC Pro Bowl at Aloha Stadium on February 10, 2008 in Honolulu, Hawaii. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, February 11, 2008



### Dallas Cowboys v Washington Redskins

LANDOVER, MD - DECEMBER 30: Linebacker DeMarcus Ware #94 of the Dallas Cowboys celebrates after a quarterback sack during the game against the Washington Redskins at FedEx Field on December 30, 2007 in Landover, Maryland. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 31, 2007



### Detroit Lions v San Diego Chargers

SAN DIEGO - DECEMBER 16: Wide receiver Chris Chambers #89 of the Chargers gets tackled after catching a pass during the game against the Detroit Lions at Qualcomm Stadium on December 16, 2007 in San Diego, California. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 17, 2007



### Dallas Cowboys v Washington Redskins

LANDOVER, MD - DECEMBER 30: Wide receiver Miles Austin #19 of the Dallas Cowboys drops a pass in the end zone while covered by cornerback of the Washington Redskins at FedEx Field on December 30, 2007 in Landover, Maryland. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 31, 2007



### AFC-NFC Pro Bowl

HONOLULU, HI - FEBRUARY 10: Head Coach Norv Turner of the San Diego Chargers calls out a play against the AFC during the 2008 NFL Pro Bowl at Aloha Stadium on February 10, 2008 in Honolulu, Hawaii. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, February 11, 2008





A Denver Broncos cheerleader performs while wearing a pink outfit in Cancer Awareness Month during the NFL football game against the Cincinnati Bengals on Sunday, October 4, 2009 in Denver, Colorado. The Broncos won the game 27-10. (AP Photo/Paul Spinelli)

Photos | Monday, October 5, 2009



### Dan Koppen

Dan Koppen, Center, New England Patriots. (Photo by Paul Spinelli)

Photos | Tuesday, December 18, 2007



### AFC-NFC Pro Bowl

HONOLULU, HI - FEBRUARY 10: Young fans hold up a sign in memory of #21 of the NFC's Washington Redskins during the game against the AFC's New England Patriots at Aloha Stadium on February 10, 2008 in Honolulu, Hawaii. (AP Photo/Paul Spinelli/Getty Images)

Photos | Monday, February 11, 2008



### AFC-NFC Pro Bowl

Aloha Stadium, the site of the Pro Bowl, in Honolulu, Hawaii. (Photo by Paul Spinelli/Getty Images)

Photos | Sunday, March 9, 2008



### 2009 NFL Cheerleaders: Week 1

A Carolina Panthers cheerleader does a dance routine during a NFL game between the Carolina Panthers and the Philadelphia Eagles on Sunday, September 13, 2009 in Charlotte. The Panthers won the game 38-10. (AP Photo/Paul Spinelli)

Photos | Monday, September 14, 2009



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### Dan Koppen

Dan Koppen, Center, New England Patriots. (Photo by Paul **Spinelli**)

Photos | Tuesday, December 18 , 2007



### AFC-NFC Pro Bowl

HONOLULU, HI - FEBRUARY 10: Young fans hold up a sign in memory of the #21 of the NFC's Washington Redskins during the game against the AFC at Aloha Stadium on February 10, 2008 in Honolulu, Hawaii. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, February 11 , 2008



### AFC-NFC Pro Bowl

Aloha Stadium, the site of the Pro Bowl, in Honolulu, Hawaii. (Photo by Paul **Spinelli** /Getty Images)

Photos | Sunday, March 9 , 2008



### 2009 NFL Cheerleaders: Week 1

A Carolina Panthers cheerleader does a dance routine during a NFL game between the Philadelphia Eagles on Sunday, September 13, 2009 in Charlotte. The Eagles won the game 38-10. (AP Photo/Paul **Spinelli**)

Photos | Monday, September 14 , 2009



### Dallas Cowboys v Washington Redskins

LANDOVER, MD - DECEMBER 30: Head Coach Joe Gibbs of the Washington Redskins watches from the sidelines during the game against the Dallas Cowboys on December 30, 2007 in Landover, Maryland. (Photo by Paul **Spinelli**)

Photos | Monday, December 31 , 2007



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### Carolina Panthers v Jacksonville Jag

JACKSONVILLE, FL - DECEMBER 9: Head Coach John Fox of the C during the game against the Jacksonville Jaguars at Jacksonville Mur December 9, 2007 in Jacksonville, Florida. The Jaguars defeated the (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 10 , 2007



### Tampa Bay Buccaneers v San Franci

SAN FRANCISCO - DECEMBER 23: Quarterback Jeff Garcia #7 of tl Buccaneers drops back to pass during the game against the San Fra December 23, 2007 at Monster Park in San Francisco, California. The Bucs 21-19. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 24 , 2007



### Tampa Bay Buccaneers v San Franci

SAN FRANCISCO - DECEMBER 23: Running back Frank Gore #21 c 49ers runs the ball during the game against the Tampa Bay Buccane 2007 at Monster Park in San Francisco, California. The Niners defeat (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 24 , 2007



### Detroit Lions v San Diego Chargers

SAN DIEGO - DECEMBER 16: Quarterback Philip Rivers #17 of the : unloads a pass during the game against the Detroit Lions at Qualcom December 16, 2007 in San Diego, California. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 17 , 2007



### Detroit Lions v San Diego Chargers

SAN DIEGO - DECEMBER 16: Running back Darren Sproles #43 of : Chargers scores an 11 yard touchdown on a fourth quarter running p against the Detroit Lions at Qualcomm Stadium on December 16, 20 California. (Photo by Paul **Spinelli** /Getty Images)

Photos | Monday, December 17 , 2007



### AFC-NFC Pro Bowl

HONOLULU, HI - FEBRUARY 10: Tight end Tony Gonzalez #88 of th Chiefs gains extra yardage after a first quarter catch against the NFC Pro Bowl at Aloha Stadium on February 10, 2008 in Honolulu, Hawaii **Spinelli** /Getty Images)

Photos | Monday, February 11 , 2008



### Dallas Cowboys v Washington Redski

LANDOVER, MD - DECEMBER 30: Running back Julius Jones #21 c Cowboys gets gang tackled by defensive end Phillip Daniels #93 and Cornelius Griffin #96 of the Washington Redskins at FedEx Field on l in Landover, Maryland. (Photo by Paul **Spinelli** /Getty ...

Photos | Monday, December 31 , 2007

### Dallas Cowboys v Washington Redski



LANDOVER, MD - DECEMBER 30: Head Coach Wade Phillips of the Dallas Cowboys watches from the sidelines during the game against the Washington Redskins at FedEx Field on December 30, 2007 in Landover, Maryland. (Photo by Paul Spinelli/Getty Images)

Photos | Monday, December 31, 2007



### Dallas Cowboys v Washington Redskins

LANDOVER, MD - DECEMBER 30: Running back Marion Barber #24 of the Dallas Cowboys straight arms safety Pierson Prioleau #20 during the game against the Washington Redskins at FedEx Field on December 30, 2007 in Landover, Maryland. (Photo by Paul Spinelli/Getty Images)

Photos | Monday, December 31, 2007



### Dallas Cowboys v Washington Redskins

LANDOVER, MD - DECEMBER 30: Kicker Shaun Suisham #6 of the Dallas Cowboys kicks a field goal to cut the Redskins lead to 10-3 in the first quarter of the game against the Washington Redskins at FedEx Field on December 30, 2007 in Landover, Maryland. (Photo by Paul Spinelli/Getty Images)

Photos | Monday, December 31, 2007



### Denver Broncos v San Diego Chargers

SAN DIEGO - DECEMBER 24: Running back Selvin Young #35 of the Denver Broncos looks for running room during the game against the San Diego Chargers at Qualcomm Stadium on December 24, 2007 in San Diego, California. (Photo by Paul Spinelli/Getty Images)

Photos | Sunday, December 30, 2007



### Tampa Bay Buccaneers v San Francisco 49ers

SAN FRANCISCO - DECEMBER 23: Quarterback Shaun Hill #13 of the Tampa Bay Buccaneers unloads a pass during the game against the San Francisco 49ers at Monster Park in San Francisco, California. The Buccaneers lead 21-19. (Photo by Paul Spinelli/Getty Images)

Photos | Monday, December 24, 2007



### Detroit Lions v San Diego Chargers

SAN DIEGO - DECEMBER 16: Strong safety Clinton Hart #42 of the Detroit Lions returns one of five Chargers interceptions during the game against the San Diego Chargers at Qualcomm Stadium on December 16, 2007 in San Diego, California. (Photo by Paul Spinelli/Getty Images)

Photos | Monday, December 17, 2007



### AFC-NFC Pro Bowl

HONOLULU, HI - FEBRUARY 10: Kick returner Devin Hester #23 of the Chicago Bears throws a lateral on a kick return against the AFC during the 2008 AFC-NFC Pro Bowl at Aloha Stadium on February 10, 2008 in Honolulu, Hawaii. (Photo by Paul Spinelli/Getty Images)

Photos | Monday, February 11, 2008



### Detroit Lions v San Diego Chargers

SAN DIEGO - DECEMBER 16: Wide receiver Shaun McDonald #84 of the Detroit Lions spikes the ball after catching a 17 yard touchdown pass in the third quarter of the game against the San Diego Chargers at Qualcomm Stadium on December 16, 2007 in San Diego, California. (Photo by Paul Spinelli/Getty Images)

Photos | Monday, December 17, 2007

### Ben Roethlisberger



In 2009, Ben Roethlisberger flew by his previous career highs in com and yards. (AP Photo/Paul **Spinelli** ) » Video: Best in the biz - Quart

Photos | Sunday, July 11 , 2010



**Kerry Collins**

Tennessee Titans Pro Bowl quarterback Kerry Collins throws against Pro Bowl at Aloha Stadium in Honolulu, Hawaii. The NFC defeated th Photo/Paul **Spinelli** )

Photos | Friday, July 8 , 2011



**Deion Sanders**

Atlanta Falcons cornerback Deion Sanders (21) gets chased while he during the NFL game against the Chicago Bears on September 27, 1 Illinois. The Bears won the game 41-31. (AP Photo/Paul **Spinelli** )

Photos | Tuesday, July 26 , 2011



**Bob Griese, Brian Griese**

Both Bob Griese and son Brian played quarterback for the Miami Dol to nine winning seasons and a pair of Super Bowl victories in the 70s 83 games as quarterback for four different teams from 1998 to 2008.

Photos | Saturday, June 19 , 2010



**Dallas Clark**

Dallas Clark led all tight ends in yards and receptions in 2009. (AP Ph » Video: Best in the biz - Tight ends

Photos | Sunday, July 11 , 2010



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